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February 18, 2011

Mr. Austin Schlick
General Counsel
Office of General Counsel
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: *Petition for Declaratory Ruling Regarding Zevo-3*, MB Docket No. 10-190

Dear Mr. Schlick:

Campaign for a Commercial-Free Childhood, by its attorneys, the Institute for Public Representation, respectfully asks the Office of General Counsel to direct Viacom and MTV Networks to supplement their February 8, 2011 Notice of *Ex Parte* Communication by providing a more detailed summary of the substance of their February 7, 2011 *ex parte* presentation as required by the Federal Communications Commission *ex parte* rules.

Written memoranda of oral *ex parte* presentations must “contain a summary of the substance of the *ex parte* presentation and not merely a listing of the subjects discussed. More than a one or two sentence description of the views and arguments presented is generally required.” 47 C.F. R. § 1.1206 (b) (2). This rule requires parties of a proceeding to be forthcoming about the substance of any *ex parte* presentation.

Viacom and MTV Networks’ February 8, 2011 Notice of *Ex Parte* Communication concerning their February 7 presentation listed the presentation’s attendees, which included counsel for Viacom and MTV Networks, counsel for Skechers USA, Inc., and representatives from the Office of General Counsel and Media Bureau. The substance of the *ex parte* presentation stated in one sentence, “The meeting covered subjects already set forth in the parties’ comments and other written materials in this proceeding.” This one sentence is not in compliance with the *ex parte* rules, nor does it meet the spirit of disclosure, fairness, and transparency historically promoted by the Commission.

For the reasons above, we ask that the Office of General Counsel direct Viacom and MTV Networks to supplement their February 8, 2011 Notice of *Ex Parte* Communication by providing a more detailed summary of the substance of their February 7, 2011 *ex parte* presentation.

Respectfully submitted,

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